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Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH

In re:

Bankruptcy No. 24-23530

Chapter 7

Debtor.

Honorable William T. Thurman

NOTICE OF ST. LUKE'S CREDITORS' MOTIONS TO COMPEL (1) ARDEN BUNDY, (2) LYDIA BUNDY D/B/A BUNDY BRAZILIAN STEAKHOUSE, (3) BUNDY INDUSTRIES LLC, AND (4) RYAN BUNDY AND BUNDY MOTORS COMPANY, TO COMPLY WITH DEPOSITION AND DOCUMENT SUBPOENAS UNDER FEDERAL RULE OF BANKRUPTCY PROCEDURES 2004

NOTICE OF HEARING

(Objection Deadline: Monday, May 5, 2025)

(Hearing Date: Wednesday June 4, 2025 at 2:00 p.m. Mountain Time)

PLEASE TAKE NOTICE that the St. Luke's Health System, Ltd., St. Luke's Regional

Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP

(collectively, "St. Luke's Creditors"), by and through their counsel, Holland & Hart LLP, have filed with the United States Bankruptcy Court of the District of Utah, four Motions to Compel (the "Motions") the following persons or entities (the "Witnesses") to comply with deposition and document Subpoenas issued under Federal Rule of Bankruptcy Procedure 2004:

- (1) Arden Bundy,
- (2) Lydia Bundy d/b/a Bundy Brazilian Steakhouse,
- (3) Bundy Industries LLC, and
- (4) Ryan Bundy and Bundy Motors Company.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

The Motions asks the Court to order the Witnesses to comply with deposition and document Subpoenas issued by the St. Luke's Creditors to the Witnesses pursuant to previously issued court orders under Rule 2004.

The Motions are on file with the Court and you can obtain a copy of the Motions through the Clerk's office or by contacting the attorneys for the St. Luke's Creditors at the addresses, emails or telephone numbers indicated above.

If you do not want the Court to grant the relief requested in the Motions, then you or your attorney must take the following two steps:

(1) On or before **May 5, 2025 (the "Objection Deadline")**, file with the Bankruptcy Court a written Objection to the Application explaining your position at:

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United States Bankruptcy Court 350 South Main Street, Room 301 Salt Lake City, UT 84101 (if mailed)

or

United States Bankruptcy Court Orrin G. Hatch U.S. Courthouse 351 South West Temple, Rm. 1.100 Salt Lake City, Utah 84101 (if delivered in person)

If you mail your objection to the Bankruptcy Court for filing, it must be deposited in the U.S. Mail in sufficient time for it to be **received** by the Court **on or before the Objection Deadline**. You must also mail a copy to the undersigned counsel at:

HOLLAND & HART LLP

Attn: Erik F. Stidham

222 S. Main Street, Suite 2200, Salt Lake City, UT 84101

Email: efstidham@hollandhart.com

(2) You must also attend the hearing on **Wednesday**, **June 4**, **2025** at **2:00 p.m.** (the "Hearing"), before the Honorable William T. Thurman. The Hearing will be held via Zoom at ZoomGov.com/join Meeting ID: 160 7523 8590 Passcode: 9626637, Phone No. 1-669-254-5252. Parties who wish to participate in the hearing should consult the Bankruptcy Court's website at https://www.utb.uscourts.gov/court-hearings-be-conducted-zoom for the most up-to-date information regarding participation at a hearing.

Failure to attend the Hearing could be deemed a waiver of your objection. If you or your attorney do not appear at the Hearing, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motions and may enter an order grating the Motions.

DATED this 15th day of April, 2025.

HOLLAND & HART LLP

/s/ Erik F. Stidham
Erik F. Stidham (Admitted Pro Hac Vice)

HOLLAND & HART LLP As local counsel

/s/ Engels Tejeda Engels Tejeda Benjamin D. Passey

Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2025, I electronically filed the foregoing with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF user.

Mark C. Rose McKay, Burton & Thurman, P.C. trustee@mbt-law.com; UT32@ecfbis.com

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AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF Registered Participants by First Class U.S. Mail, with postage prepaid, addressed as follows:

Ammon Edward Bundy, *pro se* P.O. Box 1062 Cedar City, UT 84721-0991

Ammon Edward Bundy 896 E 400 S New Harmony, UT 84757

Lydia Bundy Bundy's Brazilian Steakhouse 850 S. Bluff St St. George, UT 84770

By Internet email:

Ammon Edward Bundy aebundy@bundyfarms.com aebundy@msn.com

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<u>/s/ Engels Tejeda</u> Engels Tejeda

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